

District of Pennsylvania, and Corelogic possesses sufficient contacts with this District to be deemed to reside in this District.

FACTUAL ALLEGATIONS

6. Mr. Graham is a “consumer” as that term is defined by the FCRA. 15 U.S.C. §1681a(c).

7. Corelogic is a “consumer reporting agency” as that term is defined by the FCRA. 15 U.S.C. §1681a(f).

8. On or about December 30, 2016, Mr. Graham submitted an application to rent land from the MISA Corporation.

9. As part of considering Mr. Graham’s rental application, MISA Corporation requested a criminal background report from Corelogic.

10. On or about December 30, 2016, Corelogic prepared and sold a criminal background report about Mr. Graham to MISA Corporation (the “Report”).

11. The Report is a “consumer report” as that term is defined by the FCRA. 15 U.S.C. §1681a(d)(1).

12. The Report included false, inaccurate, misleading and/or incomplete information (collectively the “Inaccurate Information”) including but not limited to:

- a. a record of conviction for manslaughter which does not belong to Mr. Graham;
- b. failing to report the jurisdiction where the above manslaughter charge originated, the date that charges were filed or the date of conviction; and
- c. reporting an offense for disorderly conduct in an incomplete and misleading manner by failing to report that the charge in fact related to a traffic violation.

13. On or about January 11, 2017, Mr. Graham's rental application was denied in whole or substantial part because of the Inaccurate Information reported by Corelogic on the Report.

14. The Inaccurate Information included on the Report was the result of Corelogic's failure to follow reasonable procedures to assure maximum possible accuracy, *inter alia*, by: mixing criminal records that belong to another person on the Report; failing to employ procedures to properly match criminal records of individuals with common names; relying on incomplete and misleading criminal record information; and failing to consider and review actual court documents prior to including criminal records on consumer reports.

15. Corelogic acted recklessly by failing to follow reasonable procedure to assure maximum possible accuracy as described above, and further, Corelogic knew or should have known that the procedures it follows to prepare consumer reports will result in inaccuracies similar or identical to the inaccuracies that appeared on the Report prepared about Mr. Graham.

16. On or about February 6, 2017, Mr. Graham disputed the Inaccurate Information with Corelogic directly.

17. On or about February 27, 2017, Corelogic responded to Mr. Graham's dispute by informing Mr. Graham in writing that it refused to delete and/or update the Inaccurate Information disputed by Mr. Graham.

18. Corelogic failed to conduct a reasonable investigation of Mr. Graham's dispute, *inter alia*, by: failing to conduct any investigation into the Inaccurate Information at all; failing to review and consider the information submitted by Mr. Graham; failing to contact Mr. Graham to elicit more specific information about his disputes; failing to obtain and review the actual court

or police records related to the Inaccurate Information; and failing to contact persons or entities affiliated with the criminal records to verify their accuracy.

19. Corelogic acted recklessly by routinely conducting investigations in the manner described above, and further, knew or should have known that the way it investigates disputes would result in erroneous verification of false, inaccurate, incomplete and misleading criminal records similar or identical to the result of Mr. Graham's dispute.

20. Mr. Graham has suffered injuries as result of Corelogic's conduct described above including but not limited to: a denied rental application, harm to reputation, humiliation, embarrassment, time lost disputing and emotional distress.

21. Corelogic was acting by and through its agents, servants and/or employees who were acting within the course and scope of their agency or employment, and under the direct supervision and control of the Corelogic at all times relevant hereto.

COUNT I
VIOLATIONS OF THE FCRA

22. Plaintiff incorporates the foregoing paragraphs as though the same were set forth at length herein.

23. Corelogic violated the FCRA by negligently and willfully failing to follow reasonable procedures to assure maximum possible accuracy when preparing a consumer report about Mr. Graham as described above. 15 U.S.C. § 1681e(b).

24. Corelogic also violated the FCRA by negligently and willfully failing to conduct a reasonable investigation of Mr. Graham's dispute to Corelogic as described above. 15 U.S.C. §1681i(a).

25. Corelogic's conduct was a direct and proximate cause and/or substantial factor in causing the injuries to the Mr. Graham as described above.

26. As a result of Corelogic's violations of FCRA identified herein, Defendant is liable to the Mr. Graham for damages to include: statutory damages, actual damages, punitive damages, costs of this action and attorney's fees. 15 U.S.C §1681n & 1681o.

PRAYER FOR RELIEF

Plaintiff requests judgment in his favor and against Corelogic for damages to include statutory damages, actual damages, punitive damages, costs of this action, reasonable attorney's fees and such other relief that this Court deems proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury.

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